

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE
JUN 1 2005
1:00

NANCY ROSARIO, INDIVIDUALLY, AS)
SHE IS THE ADMINISTRATRIX OF THE)
ESTATE OF AWILDA SANTIAGO, ESSEX)
PROBATE COURT DOCKET #03P-2499AD1,)
P/P/A VERONICA ROSARIO AND)
CHRISTINA SANTIAGO, AND AS)
SHE IS THE ADMINISTRATRIX OF THE)
ESTATE OF JOSE SANTIAGO, BERLIN)
(CONNECTICUT))
PROBATE COURT, CASE #03-0713)
Plaintiff)

Civil Action #05-CV-10617MLW

v.)
RARE HOSPITALITY INTERNATIONAL, INC.)
d/b/a LONGHORN STEAKHOUSE)
Defendant)

DISCLOSURE OF MEDICAL INFORMATION

Pursuant to Local Rule 35.1, plaintiff in the above action hereby serves the following disclosure on defendant, RARE Hospitality International, Inc. d/b/a Longhorn Steakhouse.

Itemization of medical expenses incurred before service of complaint:

I. Christina Santiago

a.	Children's Hospital	\$122,345.62
b.	Spaulding Rehabilitation Hospital	\$ 35,994.68
c.	Whittier Rehabilitation Hospital	\$ 3,917.00
d.	Littleton Fire Department	To be subsequently supplied
	Total	\$162,257.30

Ambulance service from Children's Hospital to Spaulding Rehabilitation Hospital is unknown at this time.

Plaintiff anticipates recovery will be sought for future medical expenses on behalf of Christina Santiago.

II. Veronica Rosario

a.	Trinity Ambulance	\$ 1,103.00
b.	New England Medical Center	\$29,959.74
c.	Eastern EMS	\$ 436.00
d.	Children's Hospital	\$ 8,697.22
e.	Essex Chiropractic	\$ 889.00
f.	Advanced Spine Center	<u>\$ 1,515.00</u>
	Total	\$42,599.96

Plaintiff anticipates recovery will be sought for future medical expenses on behalf of Veronica Rosario.

III. Nancy Rosario

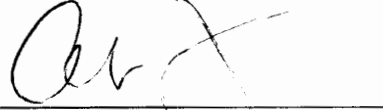
a.	Greater Lawrence Family Health Center	\$ 125.00
b.	Caritas Holy Family Hospital	<u>\$9,414.26</u>
	Total	\$9,539.26

Plaintiff anticipates recovery will be sought for future medical expenses on behalf of Nancy Rosario.

Upon reasonable telephone notice to plaintiff, defendant may inspect at any time within the next fourteen (14) days at plaintiff's counsel's office, Albert L. Farrah, Jr., One Washington Mall, Boston, MA 02108, all non-privileged medical records pertaining to the diagnosis, care or treatment of injuries for which recovery is sought.

Plaintiff

By her attorney,



ALBERT L. FARRAH, JR., ESQ.
One Washington Mall, 5th Floor
Boston, MA 02108
(617) 742-7766
B.B.O. #159340

Date: May 31, 2005

CERTIFICATE OF SERVICE

SUFFOLK, SS

May 31, 2005

A copy of the Disclosure of Medical Information was today mailed, postage prepaid to Brian Voke, Esq., Campbell, Campbell, Edwards & Conroy, One Constitution Plaza, Boston, MA 02129.



Albert L. Farrah, Jr., Esq.